

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CORNELL JONES

*Plaintiff,*

v.

LOVEBOND COMMUNITY  
OUTREACH LLC AND DARRYL  
MASON

*Defendants*

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CIVIL ACTION NO. 3:20-CV-2099

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
SUBMIT JOINT STATUS REPORT**

Plaintiff Cornell Jones, by and through undersigned counsel, pursuant to Rules 6(b) and 15(a)(3) of the Federal Rules of Civil Procedure, now files this Unopposed Motion for Extension of Time to Submit a Joint Status Report, as follows:

1. Plaintiff filed his Original Complaint in the United States District Court for the Northern District of Texas, Dallas Division on August 7, 2020.
2. Defendants Lovebond Community Outreach, LLC, and Darryl Mason filed an Original Joint Answer on October 20, 2020.
3. The Court entered a Status Report Order on October 21, 2020.
4. Plaintiff requests an extension of thirty (30) days to confer with Defendants' counsel and file a Joint Status Report.
5. This motion is not being made for the purpose of delay but is made based upon the need for time to confer and prepare the report. Counsel has undergone recent medical procedures and is currently on a reduced schedule until a fourth procedure can be performed. As a result, he will not be able to meet the deadline absent an extension.
6. Counsel for Defendants does not oppose this motion.

THEREFORE, Plaintiff respectfully requests the Court enter an order extending the deadline to file a Joint Status Report to December 4, 2020.

Respectfully submitted,

/s/R.S. Ghio

R.S. Ghio

Texas State Bar No. 00787531

**DISMUKE & WATERS, P.C.**

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ATTORNEY FOR PLAINTIFF

**CERTIFICATE OF CONFERENCE**

On November 4, 2020, I conferred with Benjamin Myers, attorney for Defendants Lovebond Community Outreach, LLC, and Darryl Mason. He has agreed to a thirty (30) day extension to file a Joint Status Report.

/s/R.S. Ghio

R.S. Ghio

Texas State Bar No. 00787531

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ATTORNEY FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

On November 4, 2020, I filed an Unopposed Motion for Extension of Time with the clerk of court for the U.S. District Court, Northern District of Texas. I hereby certify that all counsel are registered under the Court's ECF system and have been served pursuant to that system.

/s/R.S. Ghio

R.S. Ghio

Texas State Bar No. 00787531

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